

AUG 26 2006

MARY L.M. MORAN
CLERK OF COURT

Jhang/Hsu.CPL

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**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

CHIEN-JUNG HSU and
SHIH-WEI JHANG,)

Defendants.)

CRIMINAL CASE NO. 06-00037

COMPLAINT

**CONSPIRACY TO USE UNAUTHORIZED
ACCESS DEVICES**
[18 U.S.C. §§ 1029(b)(2) and 1029(a)(2)]

THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF
THAT:

On or about August 25, 2006, in the District of Guam and elsewhere, the defendants,
CHIEN-JUNG HSU and SHIH-WEI JHANG, knowingly and with intent to defraud conspired
with each other and others to use on or more unauthorized access devices during a one year
period, and by such conduct obtain things of value aggregating \$1,000.00 or more during that
period when conduct affected interstate and foreign commerce, in violation of Title 18, United
States Code, Sections 1029(b)(2) and 1029(a)(2).

1 COMPLAINANT FURTHER STATES:

2 My name is Timothy Conway, and I am a Special Agent, formerly with the United States
3 Immigration and Naturalization Service, now with United States Immigration and Customs
4 Enforcement, a component of the Department of Homeland Security. I have been employed by
5 these two agencies for over 16 years.

6 1. My duties include investigation of violations of Titles 8 and 18 of the United States
7 Code as they apply to violations of U.S. immigration laws. The information contained in this
8 affidavit is based upon witness interviews and the collection of evidence conducted by the
9 affiant. Based upon my knowledge, training, and experience with the Immigration and
10 Nationality Act (I&NA), I hereby make the following affidavit relating to the above named
11 defendants:

12 2. On August 25, 2006, two males identified as Chien-Jung Hsu and Shih-Wei Jhang
13 arrived from Saipan, Northern Mariana Islands on Continental Airlines Flight CO 9605 and
14 presented themselves for inspection before U.S. Customs and Border Protection (CBP) Officers.

15 3. On August 25, 2006, the above individuals were stopped in transit from Saipan to
16 Guam. They possessed together approximately sixteen (16) credit cards in the names of persons
17 other than their own.

18 4. Both individuals acknowledged to law enforcement officers that they were attempting
19 to use these credit cards to purchase expensive items in both Saipan and Guam.

20 5. These individuals acknowledged that they had no right to utilize these credit cards for
21 legitimate purposes.


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6. Based on the foregoing, I have probable cause to believe that defendants CHIEN-JUNG HSU and SHIH-WEI JHANG committed the offense of possession of sixteen (16) or more counterfeit or unauthorized access devices in or affecting interstate or foreign commerce, in violation of Title 18, United States Code, Sections 1029(b)(2) and 1029(a)(2).

Dated this 26th day of August, 2006.


TIMOTHY L. CONWAY
Special Agent, ICE

SUBSCRIBED AND SWORN to before me this 26th day of August, 2006.


JOAQUIN V.E. MANIBUSAN, JR.
U.S. Magistrate Judge